

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA**

Docket No. 2017-32-E

In Re:)
)
3109 Hwy. 25 S. L.L.C. d/b/a 25 Drive-In)
and Tommy McCutcheon,)
)
Complainant/Petitioner,)
)
v.)
)
Duke Energy Carolinas, LLC)
)
Defendant/Respondent.)

**DIRECT TESTIMONY

OF

DOUGLAS T. FOWLER, JR.

ON BEHALF OF DUKE ENERGY CAROLINAS, LLC**

1 **Q PLEASE STATE YOUR NAME, CURRENT POSITION, AND BUSINESS**
2 **ADDRESS.**

3 A Douglas T. Fowler, Jr., Supervisor of Construction and Maintenance, Duke Energy
4 Carolinas, LLC, 763 SC-72, Greenwood, South Carolina 29649.

5 **Q PLEASE DESCRIBE YOUR EDUCATIONAL AND PROFESSIONAL**
6 **BACKGROUND.**

7 A After receiving an Associates Degree in Industrial Electronics from Greenville Tech., I
8 went to work for DEC in 1987. I started as an engineer designing projects to provide
9 service to customers. I then moved to a position working on major projects which again
10 involved designing and constructing facilities to provide service to customers. In 2003 I
11 assumed my current position supervising construction and maintenance projects. In all of
12 the positions I have held in DEC I have been involved in construction of new facilities to
13 serve customers and in maintaining existing facilities to serve customers.

14 **Q WHAT IS THE PURPOSE OF YOUR TESTIMONY?**

15 A The purpose of my testimony is to describe the facts and circumstances surrounding the
16 two power failures that occurred in May and June of 2015 at the drive-in movie theater
17 owned by Petitioner Tommy McCutcheon ("McCutcheon") and located at 3109 Hwy 25
18 South in Greenwood County, South Carolina (the "Drive-In") and to describe the actions
19 Duke Energy Carolinas, LLC ("DEC") took in response to those power failures.

20 **Q PLEASE STATE WHAT ACTIONS YOU HAVE TAKEN IN ORDER TO**
21 **PREPARE YOUR TESTIMONY IN THIS CASE.**

1 A I have reviewed the Complaint, the Affidavit and Pre-filed Testimony of McCutcheon, the
2 Affidavit and Pre-Filed Testimony of James R. Calhoun, and the exhibits filed on behalf
3 of McCutcheon. I have also reviewed DEC's records relating to the Drive-In and spoken
4 with the DEC individuals who addressed the electrical failures at the Drive-In.

5 **Q PLEASE STATE YOUR UNDERSTANDING OF THE POWER FAILURE THAT**
6 **OCCURRED AT THE DRIVE-IN IN MAY OF 2015.**

7 A The first power failure occurred at the Drive-In on May 30, 2015. Jimmy Brown, a DEC
8 lineman who works for me, responded to the report. We received a call from the customer
9 reporting electrical arcing and that there had been a flash at the rear of the building. DEC
10 determined that a fuse had blown on the pole mounted transformer that serves the Drive-
11 In and the electrical wire that runs from the pole to the Drive-In had melted near its
12 intersection with the current transformer, which is located adjacent to the meter for the
13 Drive-In. We replaced the section of wire that had melted and were able to restore power
14 to the Drive-In.

15 **Q PLEASE STATE YOUR UNDERSTANDING OF THE POWER FAILURE THAT**
16 **OCCURRED AT THE DRIVE-IN IN JUNE OF 2015.**

17 A The second power failure at the Drive-In occurred on June 13, 2015. Mr. Brown returned
18 to the Drive-In and found that the electrical wire had melted in the same location. It was
19 again determined that a fuse had blown on the pole mounted transformer. Our crew was
20 able to replace the line that had melted and restore power.

21 **Q DID YOU VISIT THE SITE?**

1 A Yes. I went to the Drive-In on the morning of Monday June 15th following the second
2 incident. I observed smoke damage on the back of the building near where our metering
3 equipment is located. It was clear to me at that point that the existing 2/0–3 al service
4 connection did not have sufficient thermal capacity and wasn't strong enough to safely
5 provide service to the Drive-In, as shown by the fact that the line had melted on two
6 occasions.

7 **Q DOES DEC HAVE RECORDS OF THE CALLS THAT CAME INTO THE**
8 **COMPANY RELATING TO THESE INCIDENTS?**

9 A Yes. We have call records that are business records of the company, that are created at the
10 time of the events described and that are maintained by DEC in the regular course of its
11 business. **Exhibit A** is our record of the report that was phoned in on the first incident on
12 Saturday, May 30, 2015. It includes the following: “cust states power out, there was a very
13 bright spark, cable looks burned from pole to meter.” **Exhibit B** is our record of the report
14 that was phoned in on the second incident on Saturday, June 13, 2015. It includes the
15 following: “Cust states the line going from the pole to the building is on fire, cust contacted
16 FD.”

17 **Q DID DEC MAKE ANY DETERMINATIONS IN RESPONSE TO THE MAY AND**
18 **JUNE 2015 POWER FAILURES AT THE DRIVE-IN?**

19 A Yes. After the June 13, 2015 power failure, Mr. Brown, Mr. Gonzalez, and I determined
20 that the power failures that had occurred at the Drive-In were the result of thermal overload.
21 It was our opinion that there was a dangerous situation at the Drive-In and that something
22 needed to be done. Based on DEC's determination that the electrical system failures were

1 caused by thermal overload and because of the concern that there was a significant risk of
2 fire at the Drive-In, DEC made the determination that it was necessary to upgrade the
3 facilities providing McCutcheon's electrical supply. I communicated with Theo Lane who
4 handles Government and Community Relations for DEC in Greenwood and brought him
5 up to date on the situation. He then took over communications with Mr. McCutcheon who
6 was concerned that the upgrade would cause him to lose the Greenwood Rate.

7 **Q DID DEC DISCONNECT THE SERVICE TO THE DRIVE-IN?**

8 A Yes. Mr. Lane can explain the details but, when Mr. McCutcheon wouldn't agree to the
9 upgrade we proposed, we had a crew disconnect the service. The disconnection took place
10 on Wednesday, June 17.

11 **Q DID MR. MCCUTCHEON CHANGE HIS MIND ABOUT AGREEING TO THE**
12 **UPGRADE?**

13 A Yes, Mr. Lane and I met with him later on June 17th when he and his wife came into our
14 office and he signed an agreement consenting to the upgrade.

15 **Q WHAT ACTION DID DEC TAKE TO UPGRADE THE ELECTRICAL SUPPLY**
16 **AT THE DRIVE-IN?**

17 A DEC replaced the service lines serving the Drive-In and changed the transformer from a
18 25 KVA transformer to a 50 KVA transformer. The line serving the Drive-In before the
19 upgrade was one run of 2/0-3 al triplex wire. The lines we installed as part of the upgrade
20 are two runs of 4/0-3 al triplex wire. I have brought samples of the 2/0 and 4/0 wires to
21 show the difference. DEC made the decision to insist on an upgrade based upon the belief

1 that the Drive-In's thermal load had increased to an extent that additional facilities were
2 necessary to ensure safety.

3 **Q WAS DEC ABLE TO PERFORM THE UPGRADE WORK AT THE DRIVE-IN**
4 **FACILITY?**

5 A Yes. DEC was able to get the work done in time for the Drive-In to be open on Thursday,
6 June 18th so that Mr. McCutcheon did not lose revenues.

7 **Q DOES DEC HAVE RECORDS OF PREVIOUS OUTAGES OR INQUIRIES**
8 **RELATING TO THE DRIVE-IN?**

9 A Yes. Records of four outage reports in 2009 and one work request in 2008 are attached as
10 **Exhibit C** to my testimony.

11 **Q ARE THESE RECORDS CREATED AT OR NEAR THE TIME THAT THE**
12 **EVENTS OCCURRED AND ARE THEY MAINTAINED BY DEC IN THE**
13 **ORDINARY COURSE OF ITS BUSINESS?**

14 A Yes.

15 **Q DO THESE RECORDS SHED ANY LIGHT ON THE MATTERS BEING**
16 **CONSIDERED IN THIS PROCEEDING?**

17 A I was not directly involved so I can only interpret the documents, but they appear to show
18 that there had previously been issues relating to the ability of our facilities to serve the
19 greater load that was required by the Drive-In beginning in 2008.

20 **Q DOES THIS CONCLUDE YOUR TESTIMONY?**

21 A Yes, it does.

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Daily All Report

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Start Date 5/29/2015
End Date: 5/31/2015
Tuesday, February 07, 2017

Circuit	Sub station	Event	Phases	Date Time Off	Date Time On
07351203	UTOPIA	9641480	C	5/30/2015 10:00:00 PM	5/30/2015 11:50:00 PM

Dev Type	Fac Id	Dur	Cust	RS	CD	CS	WE	PO	CT	FM	EC	MS
TXOH	39806224	110	1	OH	07	11		F2		D4		73

Dev Size	PD Address	Fault Location	Cust Out Min	Chues
25.0			110	CC-E-Out-Othr-O

Action Taken	Type Event	Completed By
29	OUT	GW541SQMH

Cust Name	Cust Address	Cust Remarks
TOMMY MCCUTCHEON	3109 HIGHWAY 25 S	cust states power out, there wa a very bright spark , cable looks burnded from pole to meter. Mr. Thomas 864-323-7647

Crew	Crew Comments
GW541SQMH	CMPL 05/30/2015 23:50 on MWMS by GW541SQMH; RSN: ; RMK: REPAIRED BURNED UP CONNECTION AT WEATHER HEAD

FUN

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Daily All Report

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Start Date 6/13/2015
End Date: 6/18/2015
Tuesday, February 07, 2017

Circuit	Sub station	Event	Phases	Date Time Off	Date Time On
07351203	UTOPIA	9657114	C	6/13/2015 9:41:22 PM	6/13/2015 10:56:00 PM

Dev Type	Fac Id	Dur	Cust	RS	CD	CS	WE	PO	CT	FM	EC	MS
TXOH	39806224	75	1		07	20				20		

Dev Size	PD Address	Fault Location	Cust Out Min	Ches
25.0			75	Equip-E-911-PF- Othr_Equip-E-Out

Action Taken	Type Event	Completed By
27	OUT	did2674

Cust Name	Cust Address	Cust Remarks
TOMMY MCCUTCHEON	3109 HIGHWAY 25 S	Cust states the line going from the pole to the building is on fire, cust contacted FD.

Crew	Crew Comments
GW545SQMH	CMPL 06/13/2015 22:56 on MWMS by GW545SQMH; RSN: ; RMK: REWORKED SVC GOING THROUGH CTS WITH 4.0///PER 541...545JB...JG

FUN

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Outage Report

GREENWOOD

CIRCUIT 07351203	X-GRID 1052442.375	Y-GRID 158038.2969	PHS	OUT-ID 2792833	DATE/TIME OFF 04/09/2009 11:19	DATE/TIME ON 04/17/2009 15:18	DUR 11758				
Status CMP	#CUST 0	RS	CD 43	CS	WE 00	PO	CT	FM D4	EQ 70	MS NA	CMI 0
SUBSTATION NAME UTOPIA	FACILITY ID 39806224	DEVICE TYPE TXOH	SIZE 15	SUB EVENT N	CREW GW344	CLUES Othr-LF					

PD ADDRESS:

ACTION TAKEN:

CREW REMARKS: gw543 repaired bad neutral on tx resla-18

CUSTOMER NAME: MCCUTCHEON,TOMMY ADDRESS: 3109 HIGHWAY 25 S PHONE: 8649809871

CUSTOMER REMARKS: lights flickering ,cust said she follwed pwr line and appears there are limbs on the lines , not sure if this is the cause , pls check , may contact carolyn @ 864-980-9871 or 864-229-3979..theatre will open in 2 weeks or less need taken care of asap

ADDITIONAL
REMARKS:

FAULT LOCATION:

FOLLOW-UP
NOTES:



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Energy Delivery

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Outage Report

GREENWOOD

CIRCUIT 07351203	X-GRID 1052442.375	Y-GRID 158038.2969	PHS C	OUT-ID 2849735	DATE/TIME OFF 05/30/2009 19:51	DATE/TIME ON 05/30/2009 20:45	DUR 53				
Status CMP	#CUST 1	RS	CD 04	CS	WE 00	PO	CT	FM 11	EQ NA	MS NA	CMI 53
SUBSTATION NAME UTOPIA	FACILITY ID 39806224	DEVICE TYPE TXOH	SIZE 15	SUB EVENT N	CREW GW545	CLUES Out					

PD ADDRESS:

ACTION TAKEN:

CREW REMARKS: GW545BILL..TECH REFUSED 3D TX FUSE..DIDNT HOLD..TECH PUT 5D TX FUSE..TECH THINK 15 KVA TX MIGHT BE GOING BAD..IF POWER GOES BCK OUT,TX WILL HAVE TO BE CHG TO BIGGER SIZE

CUSTOMER NAME: MCCUTCHEON,TOMMY **ADDRESS:** 3109 HIGHWAY 25 S **PHONE:** 8649809871

CUSTOMER REMARKS: states lot full of cars for drive-in movie ... pls assist

ADDITIONAL REMARKS:**FAULT LOCATION:****FOLLOW-UP NOTES:**



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GREENWOOD

CIRCUIT	X-GRID	Y-GRID	PHS	OUT-ID	DATE/TIME OFF	DATE/TIME ON	DUR				
07351203	1052442.375	158038.2969		2850032	05/31/2009 05:41	05/31/2009 18:30	768				
Status	#CUST	RS	CD	CS	WE	PO	CT	FM	EQ	MS	CMI
CMP	0		43		00			D4	48	NA	0
SUBSTATION NAME	FACILITY ID	DEVICE TYPE	SIZE	SUB EVENT	CREW	CLUES					
UTOPIA	39806224	TXOH	15	N	GW544	On-Othr-O					

PD ADDRESS:

ACTION TAKEN:

CREW REMARKS: BILL & KEITH TO COME IN LATER IN THE MORNING & CHG TX

CUSTOMER
NAME: MCCUTCHEON,TOMMY ADDRESS: 3109 HIGHWAY 25 S PHONE: 8649809871CUSTOMER
REMARKS: TX NEED TO BE CHGADDITIONAL
REMARKS:

FAULT LOCATION:

FOLLOW-UP
NOTES:



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GREENWOOD

CIRCUIT	X-GRID	Y-GRID	PHS	OUT-ID	DATE/TIME OFF	DATE/TIME ON	DUR				
07351203	1052218.875	158150.9375	C	2802007	04/17/2009 14:52	04/17/2009 15:05	12				
Status	#CUST	RS	CD	CS	WE	PO	CT	FM	EQ	MS	CMI
CMP	1		04		00			D4	70	NA	12
SUBSTATION NAME	FACILITY ID	DEVICE TYPE	SIZE	SUB EVENT	CREW	CLUES					
UTOPIA	39806224	TXOH	15	N	GW543						

PD ADDRESS:

ACTION TAKEN:

CREW REMARKS: gw543 trasak checking voltage @ 3109 hwy 25S has pwr off 15 min. (related to event 2802007) tech took off tx to make repairs resptsl1917

CUSTOMER NAME:

ADDRESS:

PHONE:

CUSTOMER
REMARKS:ADDITIONAL
REMARKS:

FAULT LOCATION:

FOLLOW-UP
NOTES:

Duke Energy Carolinas, LLC
Exhibit C to Testimony of Douglas T. Fowler, Jr.
Docket No. 2017-32-E

STORMS Work Request Details - STRM-002

WR Type	Sv A	WR No	Job Type	Status	On
DESG	GRWD	1513023	C/I-SVC3	4X	9/26/2008 3:05 PM

Customer	Subdvn	Lot
HWY 25 DRIVE IN MARKETPLACE		

Street Number	Street Prefix	Street Name	Street Type	Street Suffix	City	State
3109		HIGHWAY 25		S	GREENWOOD	SC

Contact Name	Contact Telephone Num
TOMMY MCCUTCHEON	8649809871

Ext Job Number: 150410300343

CIS Reference Number:

Remark Type	Remark Type Desc	Remark	Remark Date	Remark Created By
CANC	CS/Cancel Work request	HAVE NOT HEARD BACK FROM CUSTOMER REGARDING THIS SERVICE AFTER SITE VISIT.	05/14/2009	JWCROUC
CUST	CS/Customer Inquiries	aerice/b&i/ per cust is interested in putting an addtl 3ph serv at this drive in movie theater..wants to spk to an engr about what he needs to do, is going to be purchasing another projector screen soon...	09/26/2008	AUTOGENWR
DIR	DIRECTIONS	OLD DRIVE-IN THEATER/ FRN GREENWOOD TOK OLD HWY 25 SOUTH GOING TOWARD EDGEFIELD ON LEFT ABOUT 3 MILES OUT CITY LIMITS .AUTO DRIVE IN THEATER..NEXT TO SOUTHPPOINT TIRE	09/26/2008	AUTOGENWR
ENGR	Engineering Remark	SITE VISIT 9/29/08 SPOKE TO CUSTOMER TOMMY MCCUTCHEON CONCERNING SERVICE TO THE PROJECTOR BOOTH FOR THE RE-OPENING OF THE DRIVE IN THEATER ON HWY 25. SOUTH. CUSTOMER HAS A PLANNED OPENING OF MARCH 2009 AND IS LEASING A 3 PHASE PROJECTOR. HE WANTS TO KEEP EVERYTHING AS IS AS FAR AS THE EXISTING SERVICE ON THE PROJECTOR BOOTH GOES SO HE CAN KEEP THE OLD DUKE RATE. HE HAS A SINGLE PHASE 60 AMP EXISTING SERVICE THAT LOOKS A LITTLE STRANGE. I GAVE HIM A LOAD SHEET AND ASKED HIM TO PUSH FORWARD ON GETTING HIS LOAD IN LINE AS NOT TO HOLD HIM UP.	09/29/2008	JWCROUC

Requirement	Requirement Description	Requirement Status	Updated On
-------------	-------------------------	--------------------	------------

Project ID Installation	Project ID Removal	Project ID Transfer
CINISC	CINRSC	CINISC

Contact Type	Oper ID	Name
ENGR	JWCROUC	CROUCH,JILES WAYNE

Inspection Number:

Inspection Date Received:

Locate Ticket #:

Date and Time Good:

Date Locate Expires:

Meter Set Date:

Site UFIN Current Date:

Site UFIN Original Date:

STORMS Work Request Details - STRM-002

Duke Energy Carolinas, LLC
 Exhibit C to Testimony of Douglas T. Fowler, Jr.
 Docket No. 2017-32-E

CIAC Type:

CIAC Amount:

Point	To	Span Length	CU Code	CU Description		Action	On	Qty	Project ID
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Class	Work Packet Name			Hours	Sched Start date	Est Completion Date	Date Completed	Assigned	Crew
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Work Packet		Crew Class	Material Item	Material Item Description	Reqn Qty	WO No	Account No	Usage
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